FILED IN OFFICE

IN THE CIRCUIT COURT OF HAMILTON COUNTY, TENNESSEE

2012 DEC 12 PM 1: 40 PAULA T. THOMPSON, CLERK

BRENDA SALAZAR,)	PYNC
Plaintiff,))	CASE NO. 12C 563
Y.)	JURY DEMAND
QCAROLINA RESTAURANTS,)	
LLC, d/b/a QDOBA MEXICAN)	
GRILL #141,)	
)	
Defendant.)	

COMPLAINT

COMES NOW the Plaintiff, Brenda Salazar, by and through counsel, pursuant to Rule 7 of the Tennessee Rules of Civil Procedure, and complains against the Defendant, QCarolina Restaurants, LLC d/b/a Qdoba Mexican Grill #141, as follows:

I. JURISDICTION

- The actions giving rise to this Complaint occurred in Hamilton County,
 Tennessee.
- 2. This Court has jurisdiction over the subject matter and the parties to this lawsuit pursuant to Tenn. Code Ann. § 16-10-101, et seq.
 - 3. Venue is proper in this Court pursuant to Tenn. Code Ann. § 24-10-101.

II. NATURE OF PROCEEDING

4. This action is brought by Plaintiff to secure redress for violation of the Tennessee Public Protection Act, Tenn. Code Ann. § 50-1-304, and under Tennessee common law for retaliatory discharge. This action seeks injunctive relief, lost wages and

benefits, front pay, compensatory damages for humiliation and embarrassment, punitive damages, prejudgment interest, court costs, and attorney fees.

III. PARTIES

- 5. The Plaintiff, Brenda Salazar, is a resident of Hamilton County, Tennessee. Her address is 5904-A Graston Avenue, Chattanooga, TN 37412.
- 6. The Defendant, QCarolina Restaurants, LLC d/b/a Qdoba Mexican Grill #141 ("Qdoba"), is a North Carolina limited liability company with its principal place of business located at 10915 Southern Loop Boulevard, Pineville, NC 28134.

IV. FACTUAL BASIS OF PLAINTIFF'S CLAIMS

- 7. Defendant is the owner and operator of the Qdoba Mexican Grill #141 restaurant located at 414 Market Street, Chattanooga, TN 37402 (hereinafter "Qdoba #141").
- 8. Plaintiff was employed by Defendant from October 28, 2009 until her termination from employment on or about September 4, 2012.
- 9. During her employment, Plaintiff observed several wage payment practices committed by Tia Lewis, the general manager of Qdoba #141 where Plaintiff was employed ("Ms. Lewis"), which were inappropriate and unlawful.
- 10. By way of example, on several occasions Plaintiff observed Ms. Lewis altering non-exempt employees' time records by reducing the working hours recorded by those employees for the purpose of ensuring that Defendant would not be forced to pay overtime for hours worked by those employees.
- 11. Ms. Lewis also recorded working hours for non-exempt employees on days that those individuals had not actually worked. By way of example, this practice

included recording working hours for an individual who was in jail at the time he was said to have been working at the Qdoba restaurant, as well as recording working hours for an individual who was in the hospital and unable to work on the days for which she was paid.

- 12. On or about September 4, 2012, Plaintiff contacted Mike Bradley (Vice-President, Operations) by telephone and left a voice mail message indicating that she wished to speak to him about the inappropriate, unlawful wage payment practices that she had observed.
- 13. Plaintiff did not receive a responsive telephone call from Mr. Bradley in response to her voice mail message.
- 14. Instead, at approximately 2:30 pm on the same day, five (5) hours after she had placed a telephone call to Mr. Bradley informing him of the unlawful practices occurring at Qdoba #141, Plaintiff was informed by Ms. Lewis that she was being terminated from her position with Defendant. The only reason offered for her termination by Ms. Lewis was the statement that "I know what you're doing, and I'm not going to let you get away with it."
- 15. The true reason for Plaintiff's discharge was her complaint about, and refusal to participate in, Defendant's continued violations of state and federal wage payment laws, including, but not limited to, the Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 201, et seq., and Tennessee state law.
- 16. After her termination, Plaintiff contacted Lynn Barber (Human Resources) and, after detailing the information that she possessed concerning unlawful wage payment issues occurring at Qdoba #141, informed Ms. Barber that she had been

terminated from her position. During that conversation, Ms. Barber indicated that she would have Mike Bradley contact Plaintiff to discuss the situation.

- 17. Later that same day (September 4, 2012), Mike Bradley did in fact telephone Plaintiff to discuss the situation. At that time, Plaintiff once again repeated her allegations concerning inappropriate wage payment practices occurring at Qdoba #141, and the fact that she had been terminated by Ms. Lewis five (5) hours after she had complained about Ms. Lewis' actions. Mr. Bradley informed Plaintiff that he would investigate the situation and get back to her with a response.
- 18. As of the date of the filing of this Complaint, Plaintiff has received no further response or other communication from Defendant concerning the situation.

V. CAUSES OF ACTION

COUNT ONE: VIOLATION OF TENN, CODE ANN. § 50-1-304

- 19. Plaintiff expressly incorporates herein by reference the allegations contained in Paragraphs 1 through 18, above, as if fully set forth herein.
- 20. Plaintiff's discharge violated the provisions of the Tennessee Public Protection Act, Tenn. Code Ann. § 50-1-304, in that her discharge was solely motivated by Plaintiff's refusal to participate in and/or remain silent about Defendant's continued violations of state and federal wage payment laws.
- 21. Plaintiff's refusal to participate in and/or remain silent about the illegal activities furthered an important public policy interest inasmuch as both the Fair Labor Standards Act (FLSA), 29 U.S.C. § 201, et seq., and the Tennessee Wage Payment Law, Tenn. Code Ann. § 50-2-101, et seq., are designed to protect the public by ensuring that employees are fully compensated for work performed on behalf of their employers.

COUNT TWO: COMMON LAW RETALIATORY DISCHARGE

- 22. Plaintiff expressly incorporates herein by reference the allegations contained in Paragraphs 1 through 22, above, as if fully rewritten herein.
- 23. Plaintiff's discharge also violated the Tennessee common-law prohibition against firing employees for refusing to participate in and/or remain silent about illegal activities. In terminating Plaintiff, Defendant was substantially motivated by Plaintiff's refusal to participate in and/or remain silent about Defendant's continued violations of state and federal wage payment law.
- 24. Defendant's act in firing Plaintiff violated public policy inasmuch as both the Fair Labor Standards Act (FLSA), 29 U.S.C. § 201, et seq., and the Tennessee Wage Payment Law, Tenn. Code Ann. § 50-2-101, et seq., are designed to protect the public by ensuring that employees are fully compensated for all work performed on behalf of their employers.

VI. DAMAGES

25. As a result of the unlawful conduct of the Defendant, Plaintiff has suffered both financially and emotionally.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays:

- That proper process be issued and served upon Defendant, and that
 Defendant be required to answer with time prescribed by law;
- b. That the Court issue an injunction requiring Defendant to reemploy Plaintiff at her former position or at an equivalent job with all employment rights and benefits to which she would have been entitled but for her

discharge, and without harassment or illegal conditions opposed upon her job; or in the alternative, for front pay and benefits in lieu of reinstatement;

- c. That upon the hearing of this cause Plaintiff be awarded judgment for damages or lost wages and the value of all employment benefits which she has lost from the last date of her employment through the date of trial;
- d. That Plaintiff be awarded prejudgment interest on any and all lost wages and employment benefits;
- e. That Plaintiff be awarded additional compensatory damages, including damages for embarrassment and humiliation;
- f. That Plaintiff be awarded her reasonable attorney fees and other litigation expenses;
- g. That Plaintiff be awarded punitive damages;
- h. That court costs be taxed against the Defendant;
- i. That a jury try the issues in this cause; and
- j. That Plaintiff be afforded any and all additional relief which the Court deems proper.

Respectfully submitted,

EVANS HARRISON HACKETT PLLC

By: Maury Nicely (TN BPR #018997) Philip Byrum (TN BPR # 020360)

835 Georgia Avenue, Suite 800 Chattanooga, TN 37402 Phone: 423.648.7890 Fax: 423.648.7897 mnicely@ehblaw.compbyrum@ehblaw.com

ATTORNEYS FOR PLAINTIFF

I hereby acknowledge and bind myself for the prosecution of this action and payment of all non-discretionary costs in this Court, which may at any time be adjudged against the Plaintiff, Brenda Salazar, if Plaintiff, Brenda Salazar, shall not pay them.

Witness my hand this 6th day of Pecember , 2012.

Respectfully submitted,

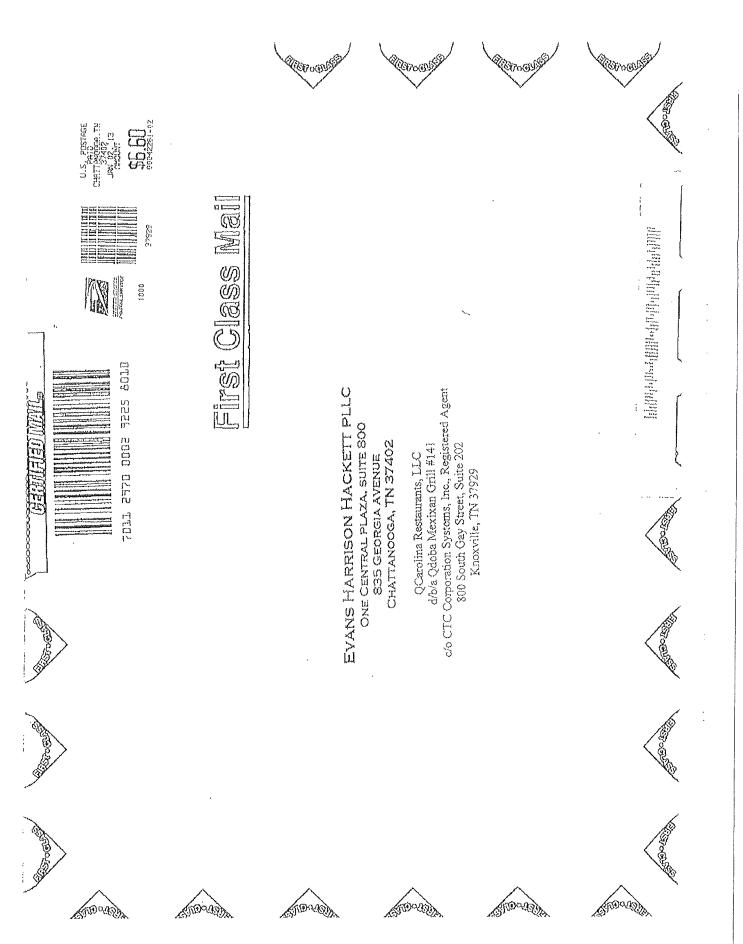
EVANS, MARRISON HACKETT PLLC

Malry Nicety (BPR No. 018997)

One Central Plaza, Ste. 800 835 Georgia Avenue

Chattanooga, Tennessee 37402

Telephone: 423.648.7890 Facsimile: 423.648-7897



Case 1:13-cv-00021-CLC-WBC Document 1-1 Filed 02/04/13 Page 9 of 13 PageID #: 14



Service of Process Transmittal 01/04/2013

CT Log Number 521888196

TOI

Thomas G Lewison OCarolina Restaurants LLC 10915 Southern Loop Bouleyard Pineville, NC 28134

RE:

Process Served in Tennessee

FOR:

QCarolina Restaurants LLC (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:

Brenda Salazar, Pltf. vs. QCarolina Restaurants, LLC, etc., Dft. Name discrepancy noted.

DOCUMENT(3) SERVED:

Summons, Cover Sheet, Complaint, Jury Demand

COURT/AGENCY:

Hamilton County Circuit Court, TN Case # 12C1503

NATURE OF ACTION:

Employee Litigation - Wrong(ul Termination - September 4, 2012 - Violatio of Tennessee Public Protection Act Code Ann. 50-1-304

ON WHOM PROCESS WAS SERVED:

C T Corporation System, Knoxville, TM

DATE AND HOUR OF SERVICE:

By Certified Mail on 01/04/2013 postmarked on 01/02/2013

JURISDICTION SERVED:

Tennessee

APPEARANCE OR ANSWER DUE:

Within 30 days from the date this summons is served upon you

ATTORNEY(S) / SENDER(S):

Maury Nicely Evans Harrison Hackett PLLC 835 Georgia Avenue

Suite 800

Chattanooga, TN 37402 423-648-7890

SOP Papers with Transmittal, via Fed Ex 2 Day, 794445571727

SIGNED ADDRESS:

ACTION ITEMS

C T Corporation System Amy McLaren 800 S, Gay Street Suite 2021 Knoxville, TN 37929-9710 800-392-9023

TELEPHONE

Page 1 of 1 / VP

Information displayed on this transmitted is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the arount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified malf receipts confirm receipt of package only, not

Hamilton County

STATE OF TENNESSEE CIVIL SUMMONS

Case Number

page 1 of 2

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Rev. 03/11

BRENDA SALAZAR VS. QCAROLINA RESTAURANTS, LLC d/b/n QDOBA MEXICAN GÜZLL KA c/o Registered Agent, CTC Corporation System, 800 S. Gay Street, Sulte 202, Knoxville, Tennessee 37929 Served On: QCarolina Restaurants, LLC d/b/a Qdoba Mexican Grill 11141 You are hereby summoned to defend a civil action filed against you in Circuit Court, Hamilton County, Tennessee. Your defense must be made rou are nereby summoned to detend a civil action fred against you in circum count, transition county, Tollinessee. For detends must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered copy to the plaintiff's attorney at the address listed below. against you for the relief sought in the complaint. Attorney for Plaintiff: Maury Nicely Evans Harrison Hackett 835 Georgia Avenue, Suite 800 Chattanooga, TN 37402 NOTICE OF PERSONAL PROPERTY EXEMPTION TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption 10 THE DEPENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary issued prior to the filing of the list. School and your family and trunks or other receptacles necessary to contain such apparet, family portraits, the family Bible and school books. Should not of these items he seized you would have the right to recover them. If you do not understand your exemption Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list. Mail list to CERTIFICATION (IF APPLICABLE) Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case. Clerk / Deputy Clerk OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law. I certify that I have served this summons together with the complaint as follows: Officer, Title RETURN ON SERVICE OF SUMMONS BY MAIL: Thereby certify and return that on ______, I sent postage prepaid, by registered actum receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant ______. On ______ I received the return receipt, which had been signed by on _____. The return receipt is attached to this original summons to be filed by the Court Clerk. Notary Public / Deputy Clerk (Comm. Expires

ADA: If you need assistance or accommodations because of a disability, please call ______, ADA Coordinator, at ()

Hamilton County

STATE OF TENNESSEE

CIVIL SUMMONS

page 2 of 2

Case Number

12C 1503

BRENDA SALAZAR VS. QCAROLINA RESTAURANTS, LLC d/b/a QDOBA MEXICAN GRILL #141

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	Signature of Plaintiff	Plaintiff's Attorney (or Person Authorized to Serve Process)							
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